References for "Libby Cohort Deaths Per Source"

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Case. 2006. Mesothelioma Update for Libby, Montana: Occupational and Non-occupational. Lung Cancer 54: S10.

Grace Memo 9/17/85, McCaig to Walsh, with chart of "Lung Cancer Deaths" 9/17/85, Exh. 22 to Expert Report of Dr. Alan C. Whitehouse.

McDonald et al. 2004. Mortality in a Cohort of Vermiculite Miners Exposed to Fibrous Amphibole in Libby, Montana. J Occup Envron Med 61:363-366.

McDonald et al. 1986. Cohort Study of Mortality of Vermiculite Miners Exposed to Tremolite. Br J Ind Med, 43:436-444.

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Whitehouse (2008), Expert Report by Dr. Alan C. Whitehouse, Exh. 2.

Whitehouse Report (2000), See Expert Report by Dr. Alan C. Whitehouse, Exh. 14.

SEP 23 19

GRACE

Zonolite
Construction Products Division

Harry Eschenbach
What do you say?
I believe this statement may have come from you
B

TO: R. C. Walsh

FROM: W. J. McCaig

DATE: September 17, 1985

SUBJECT: "...one lung cancer death among Libby Mine employees in 1966..." from Draft by Burson-Marsteller

CC: J. W. Wolter

As I mentioned during our visit in Washington, I was not comfortable with subject quote from the draft response to Public Citizen. Earl Lovick returned from his trip and I had him research the statement using the McGill Study computerized employee history file. The attached is a list of all known lung cancer deaths to date.

I would like to suggest that we obtain Dr. McDonald's concurrence to a statement in place of subject quote. I suggest:

> The occurrence of lung cancer prior to 1978 among Libby employees with exposures to high tremolite levels was not above what might have been expected among the group given their age and smoking history. ~~and the understanding of the effects of tremolite exposure during that time period~~. In other words, the occurrence of known cases was not alarming.

The original statement is incorrect and inconsistent with the data in both the McGill and the NIOSH studies.

WJM

OCT 2 1985

W. J. McCaig/rim

Attachment

20 Sep 85

15145010

The original ~~statement~~ didn't come from me. ~~My statement~~ was ~~that~~ we were aware of a few cases of lung cancer as a result of our own collection of death certificates but ~~that~~ the number was not sufficient to be considered unusual until after 1975 or 76. ~~I believe that~~ we raised

EXHIBIT
22

9/17/85

LUNG CANCER DEATHS

YR. OF DEATH	DEATHS	EMPLOYEE NAME	NUMBER OF YEARS EMPLOYED	EMPLOYMENT YEARS
**1950	1	A. Blackwell	1.08	1947-1948 (Office Janitor)
**1955	1	R. Field	2.90	1952-1955
1960	1	R. Engle	14.08	1946-1960
* 1963	2	O. Mast	9.83	1947-1956
***		R. Orsborn	2.00	1948-1950
1966	1	J. Ludwig	9.16	1957-1966
1967	1	M. McComas	8.91	1958-1967
1968	1	R. Bleich	29.50	1935-1968
*1969	2	W. Shows	1.08	1947-1948
*		J. Starr	4.00	1952-1956
*1970	1	W. Smithers	1.75	1950-1952
1973	1	L. VanHorn	23.50	1950-1973
***1976	2	E. Dinwiddie	9.83	1945-1955
***		R. Dawson	5.08	1938-1943
1977	1	R. Cohenour	24.33	1948-1974
1978	5	H. Day	11.08	1965-1976
		L. Miller	28.16	1948-1976
		G. Mitchell	15.33	1962-1978
**		P. Roberts	4.00	1970-1974
*		T. Wright	5.08	1951-1956
1979	1	V. Olson	13.66	1946-1962
1980	2	C. Peterson	6.66	1946-1953
		R. Rayome	29.00	1946-1975
*1981	2	M. Ahrenkiel	3.16	1947-1950
		R. Dahms	9.66	1957-1972
*1982	4	M. Baker	1.91	1947-1949
		J. Garrison	15.25	1950-1965
		J. Gidley	23.75	1953-1978
		V. Priest	16.91	1961-1978
1983	2	K. Koehler	6.91	1957-1964
		M. McNair	31.33	1943-1975
1984	1	H. Kimble	2.83	1962-1965

* Earl Lovick found these people to have died only becasue he was tracing them for the McGill and NIOSH studies.

** These people had insufficient time to have developed the problem as a result of employment.

*** These people died more than ten years after leaving employment. Without a study such as the McGill/NIOSH Studies, no tie to employment at Libby would be made.

CENTER FOR ASBESTOS RELATED DISEASE, LIBBY PULMONARY FUNCTION TEST (PFT) COMPARISON WITH INDEPENDENT MEDICAL EXAM PFTs

Number	Individual	Average % Difference
1	Burns, Michael	1.45%
2	Chapman, George	9.87%
3	Creighton, Tom	-12.45%
4	Drury, Delano	-6.15%
5	Dutton, Russell	-3.41%
6	Fore, Bill	-0.61%
7	Fuller, Robert	13.51%
8	Fuller, Robert 2	-2.09%
9	Hagen, Clinton	-11.20%
10	Hagen, Eloise	-24.69%
11	Hale, Doug	-16.17%
12	Kilgore, Lucille	8.71%
13	Larson, Joan	4.45%
14	Mack, Robert	-11.22%
15	Miller, William	-16.27%
16	Moeller, Billie	1.07%
17	Swennes, Jeff	7.23%
18	Swenson, David	-14.10%
19	Torgison, Walter	1.01%
20	Widic, Franklin	-1.30%
21	Young, Quentin	-4.29%
22	Zak, Helen	-4.35%
	TOTAL AVERAGE % DIFFERENCE	-3.68%

7/24/07

EXHIBIT 23

Dr. Alan C. Whitehouse - Trial Testimony and Depositions

TRIAL TESTIMONY			
Schnetter, Daniel v. W.R. Grace	Lincoln County District Court, 19th Judicial Court	Cause No. CDV-94-74	5/1/97 Tr. 130:22 - 204:22
Skramstad, Lester v. W.R. Grace	Lincoln County District Court, 19th Judicial Court	Cause No. DV-95-127	5/15/97 Tr. 3:18 - 169:23
Benefield, Gayla, P.R. v. W.R. Grace	Lincoln County District Court, 19th Judicial Court	Cause No. DV-96-170	11/5/98 906:4 - 984:17 and 11/6/98 990:21 - 1060:15
Finstad, Kenneth R. v. W.R. Grace	Lincoln County District Court, 19th Judicial Court	Cause No. DV-98-139	5/7/99 Tr. 1155:10 - 1277:4 5/10/99 Tr. 1288:9 - 1397
Fellenberg Trial	WC Court	WCC No. 2002-0704	7/14/03
Paul	WC Court	WCC No. 2003-0926	6/10/04
Joubek	WC Court	WCC No. 2004-0979	7/14/04
Mack	WC Court	WCC No. 2006-1558	10/6/06
Johnson	WC Court	WCC No. 2004-1092	9/15 - 9/17/08 & 9/23/08 & 10/15/08 & 12/1/08

DEPOS

Graham, Carol v. W.R. Grace	United States District Court for the District of Montana - Missoula Division	Cause No. CV-89-163-M-CCL	11/5/90
Hurlbert, Ervin, Kaeding, Donald, Riley, Darlene, Skramstad, Lester v. W.R. Grace	Lincoln County District Court, 19th Judicial Court	DV-95-109 DV-96-71 DV096-111 DV-95-127	2/12/97

EXHIBIT 24